

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

**IN RE WILMINGTON TRUST
SECURITIES LITIGATION**

This document relates to: ALL ACTIONS

Master File No. 10-cv-00990-SLR

(Securities Class Action)

Hon. Sue L. Robinson

ELECTRONICALLY FILED

**LEAD PLAINTIFFS' MOTION TO SUPPLEMENT AND AMEND THE
SECOND AMENDED CONSOLIDATED SECURITIES CLASS ACTION COMPLAINT**

Lead Plaintiffs the Merced County Employees' Retirement Association, the Coral Springs Police Pension Fund, the St. Petersburg Firefighters' Retirement System, the Pompano Beach General Employees Retirement System, and the Automotive Industries Pension Trust Fund, pursuant to Fed. R. Civ. P. 15(a) and (d), respectfully move to supplement and amend the Second Amended Consolidated Securities Class Action Complaint. The grounds for the Motion are set forth in the Brief and Declaration filed contemporaneously herewith.

Pursuant to Local Rule 15.1, attached hereto as Exhibit A is the proposed amended and supplemented pleading. Attached as Exhibit B is a form of the proposed amended and supplemented pleading indicating the proposed changes.

Pursuant to Local Rule 7.1.1, Plaintiffs' counsel has conferred with counsel for Defendants who has indicated that Defendants currently intend to oppose the Motion pursuant to the Court's Scheduling Order of November 16, 2012. In the event Defendants determine not to oppose, the parties will promptly notify the Court.

Dated: December 7, 2012

CHIMICLES & TIKELLIS LLP

/s/ A. Zachary Naylor

Pamela S. Tikellis (Bar No. 2172)
A. Zachary Naylor (Bar No. 4439)
222 Delaware Avenue, 11th Floor
P.O. Box 1035
Wilmington, DE 19899
Phone: (302) 656-2500
Fax: (302) 656-9053

Liaison Counsel for the Class

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

Blair Nicholas
12481 High Bluff Drive, Suite 300
San Diego, CA 92130
Tel: (858) 793-0070
Fax: (858) 793-0323

-and-

Hannah Ross (*pro hac vice*)
Sean K. O'Dowd (*pro hac vice*)
Katherine M. Sinderson (*pro hac vice*)
1285 Avenue of the Americas
New York, NY 10019
Phone: (212) 554-1400
Fax: (212) 554-1444

SAXENA WHITE P.A.

Maya S. Saxena (*pro hac vice*)
Joseph E. White III (*pro hac vice*)
Lester Hooker (*pro hac vice*)
Brandon T. Grzandziel (*pro hac vice*)
2424 North Federal Highway
Boca Raton, FL 33431
Phone: (561) 394-3399
Fax: (561) 394-3382

*Counsel for Lead Plaintiffs and Co-Lead
Counsel for the Class*